## UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

UNITED STATES OF AMERICA ٧. 07 CR 794 GEORGE KONJUCH ARMANDO NAVARRETE and NAVARRETE INDUSTRIES, INC., d/b/a "Integrated Security Solutions" and "INS"

1-18-2008 JAN 1 8 2008 47 MICHAEL W. DOBBINS

CLERK, U.S. DISTRICT COURT

NOTICE OF FILING

Patrick J. Fitzgerald TO:

Brandon D. Fox

United States Attorney, Northern District of Illinois

Everett McKinley Dirksen Federal Building 219 South Dearborn Street, Fifth Floor

Chicago, Illinois 60604

Please take notice that on January 18, 2008, I filed with the United States District Court, Northern District of Illinois, Eastern Division DEFENDANT ARMANDO NAVARRETE'S FIRST REQUEST FOR DISCOVERY, a true and correct copy of which is attached hereto and herewith served upon you.

## CERTIFICATE OF SERVICE

I, Ricardo Hidalgo, Jr., a non-attorney, on oath state:

I served this Notice of Motion and the above referenced Request for Discovery by mailing a copy via Regular U.S. Mail to the above mentioned addresses; by depositing the same in the U.S. Mail at 222 N. LaSalle St, Chicago, IL by 5:00 p.m. on January 18, 2008, with proper postage prepaid.

Signed and sworn to before me January 18, 2008

**PUBLIC** 

Law Offices of Gemma B. Dixon Attorney for Defendant Navarrete Industries, Inc. 222 N. LaSalle Street, Suite 2160 Chicago, Illinois 60601 312-658-0100 Atty. No.: 37838

OFFICIAL SEAL KENDRA J CABRERA NOTARY PUBLIC - STATE OF ILLINOIS MY COMMISSION EXPIRES:02/09/10

## UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

UNITED STATES OF AMERICA	)
v.	07 CR 794 <b>FILED</b>
GEORGE KONJUCH ARMANDO NAVARRETE and NAVARRETE INDUSTRIES, INC., d/b/a "Integrated Security Solutions" and "INS"	JAN 1 8 2008 MM  MICHAEL W. DOBBINS CLERK, U.S. DISTRICT COURT

## DEFENDANT ARMANDO NAVARRETE'S FIRST REQUEST FOR DISCOVERY

PLEASE TAKE NOTICE that Defendant ARMANDO NAVARRETE (hereinafter "Navarrete"), by and through his attorneys, the LAW OFFICES OF GEMMA B. DIXON, pursuant to Rule 16(a)(1) of the Federal Rules of Criminal Procedure, requests discovery and inspection of the following information, evidence, and materials at the Law Offices of Gemma B. Dixon, 222 North La Salle Street, Suite 2160, Chicago, Illinois 60601:

- The substance of any oral statements made by Navarrete, before or after arrest, in response to interrogation by a government agent that the government intends to use at trial.
- 2. Any written or recorded statements made by Navarrete, before or after arrest, in response to interrogation by government agents

- 3. Documents and tangible objects in the possession, custody, or control of the government that are material to preparing a defense or that the government intends to use in its casein-chief or that were obtained from or belong to Navarrete.
- 4. Examinations and test reports that are in the possession, custody, or control of the government and are material to the defense or are intended for use in the government's case-in-chief.
- 5. Written summaries of expert testimony that the government intends to use during its case-in-chief.

Respectfully Submitted,

Attorney for Defendant, Armando Navarrete

Law Offices of Gemma B. Dixon Attorney for Defendant Armando Navarrete 222 North La Salle Street, Suite 2160 Chicago, Illinois 60601 (312) 658-0100 Attorney No. 37838